

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALEKSEY RUDERMAN, ARTURO SALDIVAR,
and CHRIS POCKNELL on behalf of themselves
and all others similarly situated,

Plaintiffs,

CASE NO. 23-CV-1336

v.

KENOSHA COUNTY, KENOSHA COUNTY
SHERIFF'S DEPARTMENT, DAVID G. BETH,
ROBERT HALLISY, LARRY APKER, MARC
LEVIN, JUSTIN MILLER, and BILL BETH

Defendants.

**DEFENDANTS' NOTICE AND MOTION FOR LEAVE TO FILE AN OVERSIZED
BRIEF IN SUPPORT OF ITS MOTION FOR DISMISSAL**

Kenosha County, Kenosha County Sheriff's Department, David G. Beth, Larry Apker, Marc Levin, Justin Miller, and Bill Beth, by their attorneys, Municipal Law & Litigation Group, S.C., and with respect to Defendant Robert Hallisy, said counsel making a Special Appearance because he has not been served and thereby retains all objections to personal jurisdiction, insufficient process and insufficient service of process, respectfully submit this Motion for Permission to File a Brief in Support of its Motion for Dismissal in Excess of the Page Limit.

Civil L. R. 7(f) states that that a principal brief in support of a motion for dismissal may not exceed 30 pages unless permission is granted by the Court. Defendants respectfully requests that the Court allow it to file a principal brief in support of its motion for dismissal containing more pages than is allowed under Civil L. R. 7(f). The additional pages of legal authorities, and argument are necessary due to the importance of Defendants' interests at stake and the breadth of

the allegations contained in Plaintiffs' Complaint. The additional pages would allow Defendants to properly address, apply facts to, and fully cite authority in response to Plaintiffs' Complaint. These additional would also permit the full advocacy for dismissal of all the causes of action alleged in this lawsuit.

Dated this 6th day of November, 2023.

MUNICIPAL LAW & LITIGATION GROUP, S.C.

Attorneys for Kenosha County, Kenosha County
Sheriff's Department, David G. Beth, Robert
Hallisy (Special Appearance), Larry Apker, Marc
Levin, Justin Miller, and Bill Beth.

By: /s/ Electronically signed by Remzy D. Bitar

REMZY D. BITAR

State Bar No: 1038340

MATTEO REGINATO

State Bar No: 1089724

SAMANTHA R. SCHMID

State Bar No. 1096315

ADAM J. MEYERS

State Bar No. 1112804

730 N. Grand Avenue

Waukesha, WI 53186

O: (262) 548-1340

F: (262) 548-9211

E: rbitar@ammr.net

mreginato@ammr.net

sschmid@ammr.net

ameyers@ammr.net